Investigation into the Wholesale Billing Practices of Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

- 1. Please complete a separate form for each issue.
- 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
- 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
- 4. Please return to Nick Linden by e-mail (<u>nicholas.linden@psc.state.wi.us</u>) no later than the close of business (COB) Friday, July 25, 2003.

Submitted by: SAGE TELECOM, INC.

Contact: Stephanie Timko

Telephone Number: (214) 574-7135

e-mail: STIMKO@SAGETELECOM.NET

Subject Matter Expert (SME): Stephanie Timko

Telephone Number: (214) 574-7135

e-mail: STIMKO@SAGETELECOM.NET

Authorized Representative: (Name of person empower to make decisions and enter into

agreements on behalf of the submitting carrier(s) Bob McCausland

Telephone Number:

e-mail: RMcCausland@SAGETLECOM.NET

Name: (short identifier) Billing For Incollect Calls

Brief Description: SBC Wisconsin inappropriately billed SAGE TELECOM for

uncollectible incollect calls originated by SBC customers.

Please answer the following questions:

1. When this issue was first discovered? March 2003

- 2. How many occurrences and approximately over how long a period of time?

 Monthly
- 3. Is it a recurring problem? Yes
- 4. Your belief as to the cause of the problem.
- 5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. Yes. Section Agreement with SBC-Ameritech Wisconsin (Section 27.16.3) sets forth Sage's responsibility as a Billing and Collection Agent on behalf of SBC-Ameritech Wisconsin for collect call charges. SBC-Ameritech Wisconsin believes that this "Billing and Collection Agent" role includes liability for uncollectible Incollect charges.
- 6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
- 7. Any other pertinent information?

Please answer the following questions:

- 1. Was this issue raised with the opposing carrier? If so, when and how? Yes. In March 2003, Sage sent a notice of dispute to Mr. Greenlaw of SBC, identifying the problem, and requesting resolution of this issue. Since March, Sage has sent monthly dispute notices to SBC, with no resolution.
- 2. Was this issue escalated for dispute resolution? If so, when and in what forum?
- 3. Last known position of the opposing carrier. SBC has offered Sage an alternate ABS Agreement. However, the premise of this Agreement still holds Sage liable for a substantial percentage of uncollectible Incollect charges which is in violation of the terms of the Interconnection Agreement. Parties cannot agree on the subject of financial liability for uncollectible Incollect charges.
- 4. Were any bill adjustments made to resolve this issue? No.
- 5. Were any policies or procedures changed to address this issue? If so, what changes were made?

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Sage requests that the Commission enter an order finding that, for Incollects, Sage is the Billing and Collection Agent only and thereby, not financially liable for SBC's uncollectible Incollect charges. Further, Sage requests that all appropriate credits be issued by SBC to Sage.

Diplosition Carrier & Response (to be completed of ex July 30, 2013, prelieuring) =

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

- 1. Your belief as to the cause of the problem.
- 2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
- 3. What performance measures can be implemented to monitor the desired system

operation?

4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

- 1. Last known position of the submitting carrier.
- 2. Were any bill adjustments made to resolve this issue?
- 3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
- 4. Identify any other carrier(s) known to have experienced similar problems.
- 5. Did you identify any other problems arising from or related to this issue?
- 6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
- 7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: (Name of Carrier)

Contact [Name of Carrier Representative]
Telephone Number: (NPA)-NXX-XXXX

e-mail:

Subject Matter Expert (SME): (Name)
Telephone Number: (NPA)-NXX-XXXX

e-mail:

Authorized Representative: (Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)

Telephone Number: (NPA)-NXX-XXXX

e-mail:

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